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February 2, 2009

Anna Marie Young
Governor's Office of Planning and Research
P.O. Box 3022
Sacramento, CA 95812-3044
[emailed to CEQA.GHG@opr.ca.gov]

re: comments on *Preliminary Draft CEQA Guideline Amendments for Green House Gas Emissions*

Dear Ms. Young:

On behalf of San Francisco Planning & Urban Research, San Francisco's good government and good planning thinktank, I am writing to express support for changing the CEQA Guidelines in order to bring CEQA practice into compliance with the state's adopted goals to reduce greenhouse gas emissions.

In general, **we support the proposals that will facilitate infill development**, as it has become clear to us that building jobs and housing in neighborhoods that are relatively dense and already well served by transit is among the most important actions we can take to reduce greenhouse gas emissions.

Specifically, **we support striking the questions in Appendix G that lead to the consideration of intersection congestion and parking deficits** as significant impacts. We support the proposed text, that reads, "Would the project: Result in a substantial increase in the number of vehicle trips, roadway vehicle volume or vehicle miles traveled?"

This is a substantial improvement over the current text. Specifically:

- 1) It seems to allow agencies to submit a negative declaration for projects that do not generate vehicle trips but may reallocate roadway space, such as Bus Rapid Transit, bicycle lane and sidewalk widening projects.
- 2) It seems to exclude small infill and Transit Oriented Development projects that would not generate a "substantial" increase in trips, regardless of how congested the surroundings are.
- 3) It includes vehicle trip generation as a potentially significant impact regardless of congestion, allowing for impact fees or other mitigations to be levied against projects that generate substantial trips.

- 4) To mitigate a substantial number of vehicle trips, a project applicant could no longer widen roadways, which would be counterproductive to the goal of reducing trips.

On the other hand, this wording presents certain disadvantages as well:

- 1) Because any project that produces a “substantial” number of vehicle trips is assumed to have a potentially significant impact, a large transit-oriented project could be considered impactful due solely to its size. This may be fine, provided mitigations focus not on reducing the project size, but reducing the vehicle trip *rate*.
- 2) Projects that produce a less-than-substantial number of vehicle trips are assumed to have no transportation impact. Therefore, auto-dependent projects may require no mitigation provided only that they are small.

A way of addressing the above problems may be to introduce a second question. Specifically:

Would the project exceed the average per capita Vehicle Miles Traveled for the surrounding jurisdiction, or exceed any per capita Vehicle Miles Traveled target established by the California Air Resources Board, or an applicable regional agency, county, municipality or air district, or an applicable Sustainable Communities Strategy or Alternative Planning Strategy?

Such wording has the following advantages:

- By focusing on *per capita* vehicle trips rather than total vehicle trips, we can single out all projects that put a disproportionate burden on our regional transportation systems and air quality, not just the large projects.
- By looking at average trip generation in the surrounding community, we do not put an unfair bias toward urban sites and against all rural and suburban sites. Rather, the question asks whether the project does better or worse than would be expected for the surrounding context.
- By specifying State targets, including SB 375’s Sustainable Communities Strategy and Alternative Planning Strategy targets, it gives real weight to those efforts.

In summary, while we have not had time to review the entire set of proposed changes to the CEQA guidelines, we have thoroughly reviewed the proposals as they relate to analyzing the transportation impacts of a project. As noted, we strongly encourage the abandonment of intersection congestion and parking deficits as evidence of significant negative impact on the environment. This change alone will facilitate the kind of urban development necessary to achieve our greenhouse reduction goals. Even better would be the adoption of per capita trip generation analysis, for the reasons cited.

Please do not hesitate to contact me if you have any further questions. I can be reached at (415) 781-8726, ext. 113.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Metcalf', with a stylized, cursive script.

Gabriel Metcalf
Executive Director